

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

2023 DEC 29 AM 10:01

Plaintiff
Marjorie C. Mc Millan
25 St Mary St
Medford, MA 02155

V

Ford Motor Company
CEO James Farley
1 American Rd.
Dearborn, Michigan 48126

Sentry Ford
Owner Fraser Lemley
4100 Mystic Valley Pkway
Medford, MA 02155

Case No. _____

Jury Trial

Statement of Claim

Plaintiff leased then purchased a 2019 Ford Fusion Hybrid. November 30th 2019 while traveling in the high speed lane, the vehicle lost all power and was impossible to navigate. Narrowly escaping a horrific accident, the plaintiff with difficulty guided the car into the breakdown lane. December 1, 2019 the plaintiff reported the incident to the defendant's (Sentry Ford) dealership. The salesman said the vehicle went "limp" clearly familiar with this problem. December 6, 2019, the car was serviced at the defendant's dealership and the defendant was told the car was fine that it was just a glitch.

With fear and trepidation the plaintiff drove this car 60 miles each day to her job. This was her only mode of transportation. Constantly worrying when this power failure might sporadically occur again with more serious consequences.

July, 2023 Ford Motor Company issued a Safety recall notice 23S33 /NHTSA Recall 23V-440 stating there was defect in the Battery energy Control Module that could result in a loss of motive power which increases the risk of a crash or a vehicle fire in the trunk area, which increases the risk of injury. There was no remedy for this recall except to refrain from charging the car.

Ford was aware of this problem from 2019 but allowed the plaintiff to risk her life driving this death vehicle for four years before notifying her of the recall.

Relief

Plaintiff seeks \$50,000 to replace this defective and dangerous vehicle. \$300,000 in emotional damages for the stress of driving this death vehicle which is on going. Punitive damages \$4,000,000. The defendant knew about this defect for four years and knowingly and willfully allowed the plaintiff to risk her life on a daily basis. Waiting four years before issuing any notification callously disregarding the safety of the plaintiff and public safety. The defendant has a history of a wanton disregard for the safety of individuals and the general public.

Respectively submitted,



Marjorie C. Mc Millan
Pro-Se

Date 12-29-23
